1 2 3 4 5 6	GARRY G. MATHIASON, Bar No. 51119 KAI-CHING CHA, Bar No. 218738 DANTON W. LIANG, Bar No. 303487 LITTLER MENDELSON, P.C. 333 Bush Street, 34th Floor San Francisco, CA 94104 Telephone: 415.433.1940 Fax No.: 415.399.8490 Email: gmathiason@littler.com		
7 8 9 10 11 12 13	Attorneys for Defendants FALLANGHINA, LLC DBA PAISAN OSTER LONGBRANCH BERKELEY LLC; HAL BRANDEL; AND WALTER WRIGHT  ROBERT DAVID BAKER, Bar No. 87314 ROBERT DAVID BAKER, INC. 80 South White Road San Jose, CA 95127 Telephone: 408.251.3400 Facsimile: 408.251.3401 Email: rbaker@rdblaw.net  Attorney for Plaintiff JOSE GONZALEZ	ZIA;	
15 16 17 18 19	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA		
20 21 22 23 24 25 26 27	JOSE GONZALEZ, on behalf of himself and all others similarly situated,  Plaintiffs,  v.  FALLANGHINA, LLC DBA PAISAN OSTERIA; LONGBRANCH BERKELEY LLC; HAL BRANDEL; AND WALTER WRIGHT,  Defendants.	Case No. 16-cv-01832-MEJ  JOINT STIPULATION AND AMENDED [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE AND EXTENDING RULE 26(F) REPORT, INITIAL DISCLOSURES, AND CASE MANAGEMENT STATEMENT FILING DEADLINES	

1	WHEREAS, Plaintiff JOSE GONZALEZ ("Plaintiff") filed a First Amended		
2	Complaint ("Complaint") against Defendants FALLANGHINA, LLC DBA PAISAN OSTERIA		
3	LONGBRANCH BERKELEY LLC, HAL BRANDEL, AND WALTER WRIGHT (collectively		
4	"Defendants") in the Northern District of California on May 31, 2016;		
5	WHEREAS, on April 11, 2016, Judge Maria-Elena James issued an Order Setting		
6	Initial Case Management Conference and ADR Deadlines;		
7	WHEREAS, on May 17, 2016, attorneys Garry Mathiason, Kai-Ching Cha and		
8	Danton Liang filed their respective Notices of Appearance in this litigation (Doc No. 12, 16, 17), and		
9	attorney Scott R. Dallas filed a Notice of Change of Counsel, withdrawing as attorney of record for		
10	Defendants (Doc. No. 19).		
11	WHEREAS, Judge James scheduled the Initial Case Management Conference to be		
12	heard on July 7, 2016 at 10:00 a.m.;		
13	WHEREAS, Judge James set the last day to file a Rule 26(f) Report, complete initia		
14	disclosures or state objection in Rule 26(f) Report, and file a Joint Case Management Statement or		
15	June 30, 2016;		
16	WHEREAS, attorney Kai-Ching Cha, who will be the primary shareholder		
17	representing Defendants in this litigation, is not available for the Initial Case Managemen		
18	Conference on July 17, 2016 due to out of state travel from July 5, to July 15, 2016;		
19	WHEREAS, the parties have agreed to request that the Initial Case Managemen		
20	Conference be continued to July 21, 2016;		
21	WHEREAS, the parties also seek to extend the filing deadlines for the Rule 26(f		
22	Report, initial disclosures, and Joint Case Management Statement to July 14, 2016;		
23	WHEREAS, the parties' request is not made for the purpose of delay or any other		
24	improper purpose.		
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1	THEREFORE, in light of the parties' agreement to reschedule the Initial Cas		
2	Management Conference and extend the related deadlines and in an effort to minimize costs, the		
3	parties stipulate and agree as follows:		
4	1. The parties' July 7, 2016 Initial Case Management Con	ference shall be	
5	5 continued to July 21, 2016;		
6	6 2. The parties will file the Rule 26(f) Report and Joint C	ase Management	
7	Statement and exchange initial disclosures on or before July 14, 2016.		
8	IT IS SO STIPULATED.		
9	9 Dated: June 27, 2016 LITTLER MENDELSON, P.C.		
10	10		
11	757 Kui Ching Chu		
12			
13	Attorneys for Defendants FALLANGHINA, LLC DBA PAI OSTERIA; LONGBRANCH BER		
14	14 LLC; HAL BRANDEL; AND WAY		
15	15 WRIGHT		
16	16 Dated: June 27, 2016 ROBERT DAVID BAKER, INC.		
17	17 Bated. Julie 27, 2010 ROBERT BAVID BARER, INC.		
18	18		
19	19 <u>/s/ Robert David Baker</u> ROBERT DAVID BAKER, ESQ.		
20	20 Attorney for Plaintiff		
21	JOSE GONZALEZ		
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28	JOINT STIPLILATION AND (PROPOSED)		

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## **AMENDED** 1 **-[PROPOSED]** ORDER 2 Based upon the joint stipulation of both parties in the above-captioned case, and good 3 cause appearing, it is hereby ordered that the parties' July 7, 2016 Initial Case Management 4 Conference shall be continued to July 21, 2016. It is also hereby ordered that the parties' deadline of 5 June 30, 2016 to file a Rule 26(f) Report and Joint Case Management Statement and exchange initial 6 disclosures be extended to July 14, 2016. A joint case management statement shall be filed by July 21, 2016. 7 IT IS SO ORDERED. 8 9 Dated: June 28 . 2016 10 HONORABLE MARIA-ELENA JAMES United States Magistrate Judge 11 12 13 Firmwide:141188906.1 089340.1001 14 15 16 17 18 19 20 21 22 23 24 25 26 27

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